

## Responsiveness Summary

No.	Respondent	Date	Comment	Response
1	County Sanitation Districts of Los Angeles	March 22, 2002	Request for significant comments received from U.S. EPA.	Comments were not received in written form. In general, U.S. EPA recommended that specific equations and translation mechanisms be incorporated into the Basin Plan Amendment. Those equations and translation mechanisms can be seen in the changes between February 5, 2002 draft and March 22, 2002 draft.
2	County Sanitation Districts of Los Angeles	March 22, 2002	Request for copy of revised Basin Plan Amendment.	The revised language was mailed out on March 22, 2002 allowing 30 days for comment before the April 22, 2002 comment deadline.
3	County Sanitation Districts of Los Angeles  City of Burbank	March 22, 2002	Request to include language stating that the ammonia objectives will be the USEPA 1999 ammonia criteria multiplied by a WER derived in accordance with U.S. EPA procedures. If a site-specific WER is not developed, the default WER will be 1.0.	For water bodies where Ammonia Water Effects Ratios (WERs) have been fully approved through the Basin Plan Amendment process, the objective will be multiplied by the WER to determine the site-specific objective.
4	County Sanitation Districts of Los Angeles  City of Burbank	March 22, 2002	Request to insert language in amendment stating that ammonia effluent limits will not be included in NPDES permits for dischargers participating in the development of the WER until the study is complete and the WER approved or disapproved.	The existing Basin Plan requires compliance with the existing objectives or the approval of site-specific objectives by June 13, 2002. The staff does not believe that an additional extension is appropriate because the Basin Plan Amendment proposes to relax the water quality objective.
5	County Sanitation Districts of Los Angeles	March 22, 2002	If ammonia effluent limits are included in the permits, the amendment should include provisions for incorporating the WER approach in the permits.	A site-specific objective based on a WER is approved through the basin planning process. This site-specific objective would be translated into effluent limits in the same fashion as the other objectives.
6	County Sanitation Districts of Los Angeles	March 22, 2002	Districts request a 6 month delay in complying with the June 13, 2002 deadline due to delays in initiating sampling for their	The proposed amendment does not incorporate the compliance schedule associated with the current ammonia objectives. Given that the

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			study.	proposed objectives are more lenient than the current objectives, that discharges must comply with the current objectives by June 13, 2002, and the compliance timeframe was long (eight-years), there is little justification for an extension.
7	County Sanitation Districts of Los Angeles	March 22, 2002	Districts request that the compliance schedule be extended until June 12, 2003. This would be consistent with seven of the Districts' current Water Reclamation Plant NPDES permits. Without a compliance schedule the Districts will be open to administrative penalties and third party lawsuits.	The Regional Board staff has presented information items to the Board on three occasions which included making the Board aware of the discrepancy between the NPDES permits and the compliance deadline for the ammonia objectives. Time schedule orders (TSOs) will be approved on a case-by-case basis.
8	County Sanitation Districts of Los Angeles	March 22, 2002	Districts support the implementation of "salmonid present" objectives in COLD designated waters where the waters have been shown to have salmonid species present, or that are also designated as MIGR, and support implementation of "salmonid absent" objectives in WARM designated waters.	Staff agrees with the suggestion to add the MIGR designation in addition to the COLD designation as an indicator of the salmonids present condition and has made the change.
9	County Sanitation Districts of Los Angeles  City of Los Angeles  City of Burbank	March 22, 2002	Districts do not support approach that all fresh water bodies in the LA Region support Early Life Stages of fish. This is a defacto designation of a new beneficial use to all fresh water bodies in the LA Region. The SPWN designation already supports the beneficial use of supporting ELS and there is no evidence given that water bodies not designated SPWN are capable of supporting ELS. The approach used is against the CWA that standards be based on "sound scientific rationale."	Staff agrees with the suggestion to use the SPWN designation to determine where ELS are present and to not assume that all fresh water bodies support ELS and has changed the Basin Plan Amendment accordingly.

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10	County Sanitation Districts of Los Angeles	March 22, 2002	The ELS provision in the 1999 Update to the ammonia Criteria by EPA is not being applied properly. The ELS provision was meant to be seasonal based on when fish are not spawning and no ELS are present. ELS may be present in Southern California year round but studies need to be conducted to determine if this is the case.	Regional Board staff does interpret the ELS provision to be seasonal. The staff report indicates that, "to determine when the ELS absent provision should go into effect, States or Tribes can rely on the same date every year (based on average annual ambient temperatures) or rely on water temperature thresholds." This implies that the ELS provision may be a seasonal provision. However, Regional Board Staff does not have sufficient evidence to define a specific time frame during the year when ELS are absent. Therefore, the ELS provision applies year-round unless there is a site-specific study demonstrates that a seasonal ELS is justified. The Basin Plan Amendment process must be followed to develop a seasonal beneficial use designation.
11	County Sanitation Districts of Los Angeles  City of Los Angeles	March 22, 2002	The Districts request that a definition of an appropriate surrogate species be clearly defined in the amendment. The districts proposed that a surrogate should be defined as a species in the same genus as the endangered or threatened species.	Staff agrees with the need to define surrogate species and has added language.  "A surrogate species is one that is toxicologically and taxonomically representative of the species in question. The highest appropriate taxonomic level is generally the family, where both the surrogate species and species in question reside. However, certain standard test organisms (e.g., rainbow trout) are toxicologically representative of species from other taxonomic families and many times, even phyla." (U.S. EPA, personal communication with Foster Mayer, 04/08/02)
12	County Sanitation Districts of Los Angeles	March 22, 2002	District requests that for site-specific objectives for threatened and endangered species, the tests be conducted in site water rather than laboratory dilution water.	Regional Board staff finds this acceptable and have clarified in the documents to indicate that using site water to develop SSOs for threatened and endangered species is acceptable.

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	City of Burbank		The WER studies have shown that inherent water chemistry conditions in S. California may make ammonia less toxic to species in these water bodies.	
13	County Sanitation Districts of Los Angeles  City of Burbank	March 22, 2002	If it is not possible to use site water to develop site-specific objectives for threatened and endangered species, the Districts believe a WER should be applied to laboratory dilution water test results before inclusion in the criteria calculation.	Regional Board staff cannot envision a situation where site water would not be available. Dischargers should be able to obtain a sample of receiving water to which they discharge, and the commenters have not provided any specific explanation as to why it would not be possible to obtain site water.
14	County Sanitation Districts of Los Angeles	March 22, 2002	The calculation of the site-specific objective outlined in footnote, number 1 on page 6 is incorrect. The Districts proposed the inclusion of three equations to calculate the site –specific objective for threatened and endangered species.	The calculation of the site-specific objective outlined in footnote 1 on page 6 is correct however it does not clarify that there needs to be an adjustment made for pH and temperature. We have added such text. The narrative statement references the U.S. EPA “Guidance for Deriving Numerical National Water Quality Criteria for the Protection of Aquatic Organisms and their Uses” (1985) which provides ample information to develop site-specific objectives for the protection of threatened and endangered species.
15	County Sanitation Districts of Los Angeles  City of Los Angeles	March 22, 2002	p. 6 The proposed translation of objectives to effluent limits does not provide sufficient detail for review, and it lacks sufficient information to assess and calculate effluent limits.	The March 22nd draft of the amendment includes more detail that will allow one to calculate effluent limits.
16	County Sanitation Districts of Los Angeles	March 22, 2002	p. 6 The equations presented in the section on translation of objectives into effluent limits, do not correspond to the	These equations have been modified in the March 22 draft.

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			development of effluent limits, but rather to the development of a waste load allocation for a TMDL.	
17	County Sanitation Districts of Los Angeles	March 22, 2002	The Districts suggest that the procedure laid out in the SIP, Section 1.4 be considered.	Protocols derived from the SIP for translating objectives into effluent limits were used in the March 22 draft.
18	County Sanitation Districts of Los Angeles	March 22, 2002	The equation on page 7 presented for the WLA is incorrect based on the TSD. Based on the TSD, Cr, should be set equal to the objective, not the downstream concentration.	This change was made in the March 22 draft.
19	County Sanitation Districts of Los Angeles	March 22, 2002	The amendment should lay out the procedure the Regional Board will use to develop effluent limits, either by leaving them variable and dependent on pH and temperature of the sample, or by selecting a pH and temperature value for the calculation. If pH and temperature values are going to be used, the method for choosing the values that will be used for the calculations should be clearly identified (e.g., using specified percentiles for acute and chronic criteria, providing specific seasonal limits, etc.)	Effluent limits may be left variable or may be set depending on the variability observed in the effluent and receiving water.
20	County Sanitation Districts of Los Angeles	March 22, 2002	The Districts request specific language be added to the Basin Plan amendment stating that any exceedance of ammonia effluent limits which occurs once every 3 years on average will not be considered a violation of the permit requirements.	The purpose of this action is not to set criteria for compliance with effluent limits in permits but to establish water quality objectives. Permits will include language for determining compliance with effluent limits where needed.
21	County Sanitation Districts of Los Angeles	March 22, 2002	The staff report incorrectly states that the proposed basin plan amendment applies to inland surface waters, including enclosed	In the March 22, 2002 draft Regional Board staff added to the Basin Plan amendment objectives from the Ocean Plan to apply to enclosed bays

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			bays and estuaries. This is incorrect.	and estuaries with conditions more similar to salt than fresh waters. In addition, decision-making criteria (following guidelines from the CTR) were included in the Basin Plan Amendment to determine whether fresh or salt-water objectives should be applied.
22	County Sanitation Districts of Los Angeles	March 22, 2002	The basis for the existing Basin Plan chronic objective is incorrect. The existing Basin Plan chronic objectives, from the 1984 EPA Ammonia Criteria and addendum, are based on Acute to Chronic Ratios (ACRs). The chronic toxicity data available in 1984 was not sufficient to develop pH and temperature dependent chronic criteria, so an estimated ACR was used to convert the acute criteria to the chronic criteria.	Staff has made the correction.
23	County Sanitation Districts of Los Angeles	March 22, 2002	In paragraph 4, page 4 of the staff report, the last sentence should say, the 30-day averaging period is justified based on tests conducted on the fathead minnow ( <i>Pimephales promelas</i> ) and fingernail clam ( <i>Musculium transversum</i> ).	Staff has made the correction.
24	County Sanitation Districts of Los Angeles	March 22, 2002	Page 5, last paragraph the minimum difference should be expressed as a negative number.	Regional Board staff agrees and has made the change.
25	County Sanitation Districts of Los Angeles	March 22, 2002	On page 7, last paragraph, the discussion of the chronic criteria needs to be clarified.	The content of Regional Board's description of this is the same as proposed by the Districts.
26	County Sanitation Districts of Los Angeles	March 22, 2002	On pages 8 & 9 of the Staff Report, the ratios of the current chronic Basin Plan objectives and the 1999 U.S. EPA recommended chronic criteria needs to be	It is correct that 4-day objectives (called "chronic") in the current Basin Plan were compared to 4-day criteria (called "sub-chronic") in the 1999 Update. A statement was added to

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			clarified. The Basin Plan appears to be compared to the sub-chronic (4-day) EPA criteria when calculating the range of differences between the criteria.	clarify this. In addition, Regional Board staff has changed the values 22 to 24.76 and 11 to 11.58 to be more precise.
27	County Sanitation Districts of Los Angeles	March 22, 2002	Districts request that in the Staff Report under the section entitled "Compliance with Proposed Objectives" it be added that the revised objectives will not be placed in permits until the WER study underway is complete.	The existing Basin Plan requires compliance with the existing objectives or the approval of site-specific objectives by June 13, 2002. The staff does not believe that an additional extension is appropriate because the Basin Plan Amendment proposes to relax the water quality objective. Dischargers have already had 8 years to comply with the existing objective or to develop a site-specific objective. The new objectives will be enforceable upon final approval by U.S. EPA.
28	County Sanitation Districts of Los Angeles	March 22, 2002	The Districts request that the language under the "Chronic Objectives-ELS Provision" of the Staff Report be revised to remove the ELS designation from all water bodies in the Los Angeles Region.	Staff agrees with the suggestion to use the SPWN designation to determine where ELS are present and to not assume that all fresh water bodies support ELS.
29	County Sanitation Districts of Los Angeles	March 22, 2002	The Districts request that a discussion of the pH and temperature conditions that will be used to develop effluent limits be discussed in the Staff Report under the section entitled "Applicable Temperature and pH ranges."	Effluent limits may be left variable or may be set depending on the variability observed in the effluent and receiving water.
30	County Sanitation Districts of Los Angeles  City of Los Angeles	March 22, 2002	Footnote on page 16 of Staff Report should be updated to reflect the correct method for determining the appropriate SSOs for threatened and endangered species.	The calculation of site-specific objectives outlined in footnote 1 on page 6 is correct however it does not clarify that there needs to be an adjustment made for pH and temperature. We will add such text.

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31	County Sanitation Districts of Los Angeles	March 22, 2002	Update the discussion on page 17 regarding the Translation of Objectives into Effluent Limits based on the requested changes to the Basin Plan amendment discussed previously.	As discussed earlier, the proposed changes were made to the March 22 draft.
32	County Sanitation Districts of Los Angeles	March 22, 2002	The Districts request that an alternative be included in the Alternatives section that the WER being developed for certain water bodies in the Los Angeles Region, be included as a recognized alternative and that the Regional Board staff support the adoption of a successfully completed, approved WER.	The Basin Plan contains a provision for site-specific objectives. The provision can be found at the end of Chapter 3: Water Quality Objectives. Any site-specific objectives based on WERs will need to be approved through the basin plan amendment process.
33	City of Los Angeles	March 22, 2002	The City requests that the ammonia objectives be adopted but that the implementation portion of the amendment be changed per their comments or postponed.	Many of the comments on the implementation provisions have been incorporated into the March 22 draft.
34	City of Los Angeles	March 22, 2002	Amendment, page 1, 3 <sup>rd</sup> ¶, The last sentence states that the objective includes "limits." The City recommends using the words "The chronic objective is set based on a 30-day averaging period and the sub-chronic objective is set based on a 4-day averaging period." With the objectives including these averaging periods, the effluent limitations derived from these objectives could have longer averaging periods so long as they objective is met within its anticipated averaging period.	We have eliminated the word "limits" because the objective does not become the limitation until after you do the calculation. Permits issued by the Regional Board do not have averaging periods less than one month. In most cases, compliance with effluent limits is based on a daily maximum and monthly average limits.
35	City of Los Angeles	March 22, 2002	Amendment, page 1, & Draft Staff Report, p. 15, ¶ 1. compliance schedule, The compliance schedule should not be	The Regional Board is not required to provide a new compliance schedule when the Regional Board relaxes a water quality objective. While it



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			removed. Federal and state law requires that the RWQCB adopt adequate implementation provisions for new and revised water quality standards, including compliance schedules.	is true that the Porter-Cologne Act (Water Code, § 13242) requires a program of implementation and the Clean Water Act's continuing planning process requires adequate implementation (33 U.S.C. § 1313(e)(3)(F), these requirements do not require the Regional Board to establish a new compliance schedule for a relaxed water quality objective. Under existing, more stringent law, by the time the proposed amendment takes effect, the discharges should already be attaining the water quality objective proposed in this amendment. The continuing planning process only requires "adequate implementation" for revised water quality standards, and the Regional Board staff has concluded that requiring immediate compliance with a less-stringent water quality objective is adequate. A contrary interpretation would reward dischargers who have not been diligent in complying with existing standards that had an eight-year compliance schedule.
36	City of Los Angeles	March 22, 2002	Tables are misnumbered.	Table 3-43 appears to be a typo though the strikeout of the 4 is just not visible. We have altered the strikeout so it is clear that it should read 3-3.
37	City of Los Angeles	March 22, 2002	The use of "three years on the average" as given in the calculation section under Ammonia is confusing. Does this represent a running average of one-hour and thirty-day average concentrations for CMC and CCC respectively? Or would dischargers be allowed to negotiate the kind of average that would be used?	The purpose of this action is not to set criteria for compliance with effluent limits in permits but to establish water quality objectives. Permits will include language for determining compliance with effluent limits where needed.

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38	City of Los Angeles	March 22, 2002	Amendment and Staff Report. The assumption that salmonids species are present in COLD designated waters without any evidence to support this assumption is unfounded and should be removed.	Staff disagrees that COLD waters are not indicative of salmonid species habitat. COLD waters are designated to support salmonid species as well as other cold water species. Staff agrees that waters with the designated beneficial use MIGR are also indicative of salmonids and has added that in addition to the COLD designation to determine the presence of salmonids.
39	City of Los Angeles	March 22, 2002	Protection of salmonid species would seem more applicable to MIGR use.	Staff agrees that waters with the designated beneficial use MIGR are indicative of salmonids and has added that in addition to the COLD designation to determine the presence of salmonids.
40	City of Los Angeles	March 22, 2002	Amendment, p.6 & 7 and Staff Report. The implementation provisions are incomplete with regards to riparian “flow models” for Effluent Dominated Waters.	The Regional Board does not have a definition or policy for Effluent Dominated Waters (EDW) to date. We acknowledge that many waters in some of the channels in the Los Angeles Region largely consist of effluent; however this does not confer special status to EDWs. We have provided recognition (top of page 9 of the March 22 draft Staff Report) of the need for “other appropriate critical flow conditions” for defining site-specific critical flow conditions.
41	City of Los Angeles	March 22, 2002	Request for greater mention of WERs.	Regional Board staff will be adding some additional language on WERs.
42	City of Los Angeles	March 22, 2002	The proposed implementation provisions suggest usage of maximum daily limits (MDLs) which are not allowed under federal regulations for publicly owned POTWs unless monthly and weekly averages are impracticable. Therefore, weekly and monthly averages should be included in	In lieu of an AWEL (average weekly effluent limit) limit for POTWs, the Regional Board is establishing implementation procedures that will establish both MDELs (maximum daily effluent limits) and AMELs (average monthly effluent limits) for ammonia in permits. This approach is consistent with the EPA's recommendation for

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			permits for POTWs.	establishing MDELs, in lieu of AWELs, for toxic pollutants and pollutant parameters in water quality permitting for POTWs (see U.S. EPA NPDES Permit Writers' Manual, EPA-833-B-96-003, December 1996). This approach for toxic pollutants and pollutant parameters in water quality permitting is appropriate for two reasons. First, the basis for the 7-day average effluent limit for POTWs derives from technology based requirements for secondary treatment. This basis is not related to the need for assuring achievement of water quality standards and the protection of aquatic organisms from toxic effects. Second, an AWEL, which could comprise up to seven or more daily samples, could average out peak toxic concentrations of ammonia and, therefore, a discharger's potential for causing acute toxic effects would be missed by the permitting authority. A MDEL, rather than an AWEL, is more toxicologically protective of potential acute toxicity impacts from ammonia, a fast acting toxicant. Therefore, weekly limits are impractical.
43	City of Los Angeles	March 22, 2002	Amendment. The City suggests that the second sentence of the second paragraph on page 2 of the Staff Report be modified. It should read "these criteria are to reflect the latest scientific knowledge on the identifiable effects of pollutants on public health and welfare, aquatic life, and recreation <i>but are issued without regard to cost or feasibility.</i> " Draft Staff Report. Has the RWQCB staff developed either a trade-off curve or a	The proposed objectives are less stringent than the existing objectives so the associated costs should be less. Neither the Porter-Cologne Act nor the Clean Water Act requires a cost-benefit analysis. However, the Regional Board must consider economics.

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			decision matrix to compare costs of studies, design, construction, and operations versus benefits of species numbers and viability?	
44	City of Los Angeles	March 22, 2002	Region IX by the U.S. EPA Regional Technical Advisory Group (RTAG) and SWRCB State STAG (STRTAG) are developing Nutrient Criteria and do not require that the RQWQCB adopt ammonia objectives until the end of 2004. The City request that the RWQCB Draft Staff Report language accurately reflects these facts, and that the RWCQB commit to participation with the RTAG/STRTAG in developing Nutrient Criteria.	The focus of this group is on developing nutrient objectives primarily to control eutrophication not on developing ammonia objectives. The Regional Board has been active in the RTAG and STRTAG for the life of each committee.
45	City of Los Angeles	March 22, 2002	Draft Staff Report, pg. 10, Selected Species Table, The proposed amendment should incorporate actual species native to and found in the Los Angeles Region, instead of species that may not exist in the region, and should determine the actual number of spawning days for local fish species.	The existing table is based on U.S. EPA criteria and is protective of beneficial uses on a national basis. To date we do not have the data to provide a table that is tailored to species found and potentially found in California.
46	City of Los Angeles	March 22, 2002	Comment #19 re rounding error.	Correction was made.
47	City of Los Angeles	March 22, 2002	Comment #20 The City requests a paragraph indicating the ratio of increase between the current Basin Plan Objectives and the U.S. EPA Recommended Criteria for the specific pH range of 7.25 to 8.80.	These ratios will be presented during the presentation to the board.
48	City of Los Angeles	March 22, 2002	The RWQCB assumes that the economic burden on the regulated community will be less than the burden resulting from the existing objectives. However because the compliance schedule in the Basin Plan for	The Regional Board staff disagrees. Neither the Porter-Cologne Act nor the Clean Water Act requires a cost-benefit analysis. However, the Porter-Cologne Act does require the Regional Board to consider economics. Here, the staff

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			the existing ammonia objectives deferred compliance with those objectives, those objectives are not the proper Base Case. Therefore, the Base Case becomes the new Basin Plan objectives. The least economic burden on the regulated community would be compliance with ammonia objectives that are implemented with inclusion of the City's comments, which describe and advocate appropriate steps and changes in language to proposed Amendment. The RWQCB should consider economic differences between proposed amendment and amendment with modifications suggested by the City.	has determined that, since discharges should have achieved the previous, final water quality objective by the time the proposed amendment takes effect, the economic differences between the prior objective and the proposed, less-stringent objective provides the appropriate economic consideration. In addition, the Regional Board is not required to cost out each possible implementation program. To the extent identified by the dischargers, the Regional Board can consider the costs of different implementation programs, but such cost considerations are not dispositive.
49	City of Los Angeles	March 22, 2002	Staff Report, p. 18. A fourth alternative that the City supports is adoption of the ammonia criteria part of the proposed amendment with the few comments pertaining to it, and the adoption of implementation provisions after revision as described by comments presented herein.	What the staff agrees to will be incorporated into the staff report as the staff recommends. So City recommendations would be incorporated into the staff recommended option.
50	City of Los Angeles	March 22, 2002	Staff Report, Table 3. The proposed Table 3 on Chronic Criteria with ELS absent, if taken from the U.S. EPA 1999 Update, should include an asterisk on the temperature, 16C as with 15 C, and the corresponding footnote, "At 15 C and above, the criterion for fish ELS absent is the same as the criterion for fish ELS present."	The change was made in the March 22, 2002 Staff Report.

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51	City of Los Angeles	March 22, 2002	The City requests a 60-90 day review period for all future regulatory proposals, including Basin Plan Amendments because all policy-type comments must be approved by the City Council with Mayoral concurrence prior to submission to the RWQCB.	The Regional Board values the input of stakeholders such as the City. Already the Regional Board provides many opportunities for stakeholder involvement in the basin planning process—including workshops sometimes years before any proposed action. On controversial items, the Regional Board will endeavor to provide stakeholders more than the 45-day notice of a proposed action required by state and federal law. However, some of the Regional Board's actions are dictated by schedules beyond the Regional Board's control (e.g., the NRDC TMDL consent decree).
52	City of Santa Clarita	March 20, 2002	The acute objectives should only apply to existing COLD beneficial uses and not potential COLD beneficial uses since the criteria depend on the actual existence of salmonids.	Staff disagrees. Under federal law we are required to treat potential beneficial uses in the same manner we treat existing beneficial uses. If this were not the case then waters with potential beneficial uses would never achieve those uses.
53	City of Santa Clarita	March 20, 2002	Dischargers to waters designated potentially SPWN should be allowed to invoke the ELS absent provision.	Staff disagrees. Under federal law we are required to treat potential beneficial uses in the same manner we treat existing beneficial uses. If this were not the case then waters with potential beneficial uses would never achieve those uses.
54	City of Santa Clarita	March 20, 2002	Chronic objectives should not need to be met year-round regardless of whether or not it is the time of year for ELS fish.	Regional Board staff does not have sufficient data to determine a seasonal beneficial use designation. Therefore Early Life Stages are assumed present year-round unless a site-specific study is conducted which justifies a seasonal provision. The Basin Plan Amendment process must be followed to develop a seasonal beneficial use designation.

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55	City of Santa Clarita	March 20, 2002	The site-specific study criteria, procedure, and approval are too vague. The City suggests that the LARWQCB include who the site specific study should be submitted to for approval, does it require submittal to U.S. EPA, when the site specific studies be accepted, a specific review time, whether Board approval is necessary. In addition define "public scrutiny" or remove it.	There is a section of the Basin Plan that addresses the development of site-specific objectives. Site-specific objectives must go through the same basin plan amendment process as region-wide water quality objectives, including Regional Board adoption, State Board approval, Office of Administrative Law approval, and U.S. EPA approval.
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